

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF VIRGINIA

RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S AMENDED DISCLOSURE
STATEMENT

DEFENDANT'S AMENDED DISCLOSURE STATEMENT

Comes now, Defendant Jason Goodman, Pro Se, pursuant to Federal Rule of Civil Procedure 26(a)(1) and FRCP rule 7.1 to submit his disclosures as follows. Defendant reserves the right to supplement his disclosure statement as continuing investigation and discovery may alter this disclosure and/or identify other potential witnesses, documents, and information.

1 1. Individuals likely to have discoverable material

- 2
- 3 a. Robert David Steele (knowledge regarding the allegations set forth in the
- 4 Complaint and the denials, defenses, and allegations set forth in the
- 5 Defendants' Answers) c/o Steven S. Biss (VSB No. 32972) E-mail:
- 6 stevenbiss@earthlink.net 300 West Main Street, Suite 102 Charlottesville,
- 7 Virginia 22903 Phone: (804) 501-8272 Fax: (202) 318-4098 Counsel for
- 8 Plaintiffs
- 9
- 10 b. Representative of Earth Intelligence Network (knowledge regarding the
- 11 allegations set forth in the Complaint and the denials, defenses, and
- 12 allegations set forth in the Defendants' Answers) c/o Steven S. Biss (VSB
- 13 No. 32972) E-mail: stevenbiss@earthlink.net 300 West Main Street, Suite 102
- 14 Charlottesville, Virginia 22903 Phone: (804) 501-8272 Fax: (202) 318-
- 15 4098 Counsel for Plaintiffs
- 16
- 17 c. Devin Nunes (associate of plaintiff knowledge regarding the allegations set
- 18 forth in the Complaint and the denials, defenses, and allegations set forth in
- 19 the Defendants' Answers) 264 Clovis Avenue Suite 206 Clovis, CA 93612
- 20 Main: (559) 323-5235 Fax: (559) 323-5528
- 21
- 22 d. Jason Goodman (knowledge regarding the allegations set forth in the
- 23 Complaint and the denials, defenses, and allegations set forth in the
- 24 Defendants' Answers) 252 7th Avenue Apt 6s New York NY 10001 Pro Se
- 25 Defendant
- 26
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- 28

- 1 e. Patricia A. Negron (knowledge regarding the allegations set forth in the
2 Complaint and the denials, defenses, and allegations set forth in the
3 Defendants' Answers) c/o R. Johan Conrod, Jr. (VSB No. 46765) E-mail:
4 rjconrod@kaufcan.com KAUFMAN & CANOLES, P.C. 150 West Main
5 Street, Suite 2100 Norfolk, VA 23510 Phone: (757) 624-3000 Fax: (888) 360-
6 9092 Terry C. Frank, Esq. (VSB No. 74890) E-mail: tcfrank@kaufcan.com
7 Benjamin A. Wills, Esq. (VSB No. 88109) E-mail: bawills@kaufcan.com
8 KAUFMAN & CANOLES, P.C. 1021 E. Cary Street, Suite 1400 Richmond,
9 Virginia 23219 Phone: (804) 771-5700 Fax: (888) 360-9092 Counsel for
10 Defendant Patricia A. Negron
11
12 f. Susan Holmes a/k/a Susan Lutzke a/k/a Queen Tut1 (knowledge regarding the
13 allegations set forth in the Complaint and the denials, defenses, and
14 allegations set forth in the Defendants' Answers) 1221 University Ave., Unit
15 D202 Fort Collins, CO 80521 Pro se Defendant
16
17 g. D. George Sweigert (potential knowledge regarding the online activities of the
18 parties related to the allegations set forth in the Amended Complaint and the
19 Defendants' Answers) c/o P.O. Box 152 Mesa, AZ 85211 Prospective Pro se
20 Intervenor
21
22 h. George Webb Sweigert (brother of D. George Sweigert with potential
23 knowledge regarding the online activities of the parties related to the
24 allegations set forth in the Amended Complaint and the Defendants' Answers)
25 Country Inn and Suites by Raddison 8850 Hampton Mall Dr N, Capitol
26 Heights, MD 20743 (503) 919-0748
27
28

- i. Dr. Cynthia Ann McKinney (knowledge of the allegations set forth in the Amended Complaint and the Defendants' Answers specifically with respect to the Plaintiffs' #UNRIG campaign, its operation, and donations thereto) Address and number unknown.
- j. Manuel Chavez III (Former Associate of Plaintiff and recent associate of D. George Sweigert with knowledge regarding the allegations set forth in the Complaint and the denials, defenses, and allegations set forth in the Defendants' Answers). Address unknown (480) 332-9117
- k. Tyroan Simpson (Former Associate of Plaintiff and recent associate of D. George Sweigert with knowledge regarding the allegations set forth in the Complaint and the denials, defenses, and allegations set forth in the Defendants' Answers). Address and phone number unknown
- l. Nathan Stolpman (Former Associate of Plaintiff and recent associate of D. George Sweigert with knowledge regarding the allegations set forth in the Complaint and the denials, defenses, and allegations set forth in the Defendants' Answers). Address and phone number unknown
- m. Jacquelyn Weaver (associate of D. George Sweigert with knowledge regarding the allegations set forth in the Complaint and the denials, defenses, and allegations set forth in the Defendants' Answers). 102 Fern Purvis, MS 39475 jacquelyn113@hotmail.com
- n. Steve Outtrim (associate of D. George Sweigert and co-Defendant Lutzke with knowledge regarding the allegations set forth in the Complaint and the

1 denials, defenses, and allegations set forth in the Defendants' Answers). 90

2 Franklin Road Freemans Bay Auckland 1011 New Zealand

3 o. Kevin Marsden (associate of D. George Sweigert with knowledge regarding
4 the allegations set forth in the Complaint and the denials, defenses, and
5 allegations set forth in the Defendants' Answers).

6
7 p. Jake Morphonios (associate of D. George Sweigert and co-Defendant Lutzke
8 with knowledge regarding the allegations set forth in the Complaint and the
9 denials, defenses, and allegations set forth in the Defendants' Answers).
10 morphonios@yahoo.com
11

12 q. Dean Fougere (associate of D. George Sweigert with knowledge regarding the
13 allegations set forth in the Complaint and the denials, defenses, and
14 allegations set forth in the Defendants' Answers) 154 Lake Drive Plymouth
15 MA 02360 (508) 329-2046
16

17 r. Quinn Michaels (AKA Corey Aiken)(former associate of Defendant Goodman
18 with knowledge regarding the allegations set forth in the Complaint and the
19 denials, defenses, and allegations set forth in the Defendants' Answers)
20 address unknow phone number (503) 395-xxxx
21

22 s. Steven S. Biss (council for Plaintiff and participant in alleged conspiracy to
23 bring frivolous lawsuits against Defendant, with knowledge regarding the
24 allegations set forth in the Complaint and the denials, defenses, and
25 allegations set forth in the Defendants' Answers and motion to disqualify) 300
26 West Main Street, Suite 102 Charlottesville Virginia 22903 (804) 501-8272
27
28

1 t. Tanya Cornwell (wife and paralegal of Steven S Biss and participant in
2 alleged conspiracy to bring frivolous lawsuits against Defendant, with
3 knowledge regarding the allegations set forth in the Complaint and the
4 denials, defenses, and allegations set forth in the Defendants' Answers and
5 motion to disqualify) 300 West Main Street, Suite 102 Charlottesville Virginia
6 22903 (804) 501-8272
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8 2. Documents

9
10 The Defendant intends to use the following documents in support of his case

- 11 a. All documents identified and referred to in the parties' pleadings, including
12 documents that are linked via internet URLs
13
14 b. All documents produced in discovery by the parties;
15
16 c. E-mails exchanged between Defendant Goodman and Plaintiff
17
18 d. E-mails exchanged between Defendant Goodman and Co-Defendant Negron.
19
20 e. E-mails exchanged between Defendant Goodman and Co-Defendant Lutzke
21
22 f. E-mails and telephone calls between Defendant Goodman and Counsel for
23 Plaintiff
24
25 g. E-mails and telephone calls between Defendant Goodman and William F.
26 Kernan
27
28 h. E-mails provided by Manuel Chavez III between Chavez and Biss, Chavez
and Cornwell, Chavez and Plaintiff as well as other parties contained in the
emails.
i. All documents produced by third-parties in response to Rule 45 Subpoenas.

3. Damages

1 Defendant Goodman is not claiming any damages at this time but reserves his right to
2 amend that in the future.

3 4. Insurance

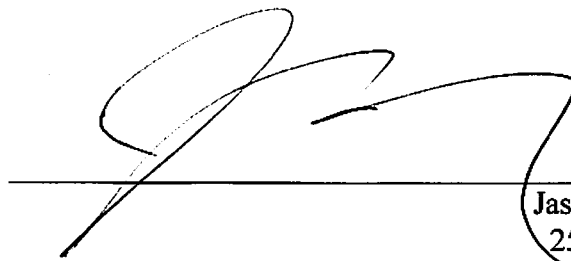
5 There is no applicable insurance.

6 Defendant reserves the right to amend and supplement these Rule 26(a)(1) Disclosures in
7 accordance with the Rule 26 FRCP.

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9 DATED: Jan 20, 2020

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11 Respectfully submitted,

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Jason Goodman, Pro Se
252 7th Avenue Apt 6s
New York, NY 10001
truth@crowdsourcethetruth.org

Circuit Court for Eastern Division Virginia

Case No. 3:17-cv-601-MHL

City or County

Robert David Steele and Earth Intelligence Networ

Jason Goodman

Name

Name

11005 LANGTON ARMS CT

252 7th avenue

6s

VS.

Street Address

Apt. #

Street Address

Apt. #

OAKTON, VA 22124 (571) 320-8573

New York NY 10001 (323) 744-7594

City State Zip Code Area Telephone
Code

City State Zip Code Area Telephone
Code

Plaintiff

Defendant

CERTIFICATE OF SERVICE

(DOMREL58)

I HEREBY CERTIFY that on this 20 day of January, 2020, a copy
of the document(s) entitled DEFENDANT'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE

Title of Document(s)
was/were mailed, postage prepaid to:

Terry Frank

Opposing Party or His/Her Attorney

1021 E. Cary Street, 14th Floor

Address

Richmond VA 23219

City

State

Zip

January 20 2020
Date


Signature

Circuit Court for Eastern Division Virginia

Case No. 3:17-cv-601-MHL

City or County

Robert David Steele and Earth Intelligence Networ

Jason Goodman

Name

Name

11005 LANGTON ARMS CT

252 7th avenue

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of the document(s) entitled DEFENDANT'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE

Title of Document(s)
was/were mailed, postage prepaid to:

Steven S Biss

Opposing Party or His/Her Attorney

300 West Main Street Suite 102

Address

City State Zip
Charlottesville VA 22903

Date
January 20 2020

Signature



1 IN THE UNITED STATES DISTRICT COURT

2
3 FOR THE EASTERN DISTRICT OF VIRGINIA

4 RICHMOND DIVISION

5 ROBERT DAVID STEELE, et al.,

Case No.: 3:17-cv-00601-MHL

6 Plaintiff,

7 vs.

DEFENDANT'S SWORN STATEMENT

8 JASON GOODMAN, et al.,

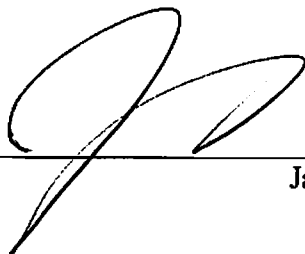
9 Defendant

10
11 **DEFENDANT'S SWORN STATEMENT**

12
13 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.

14 Further, I hereby attest that the attached exhibits are accurate and true copies of source
15 documents as described. Video and telephone recording transcripts may contain typos due to
16 voice to text transcription software. True and accurate copies of original video and audio
17 recordings can be provided should it please the court.
18

19 Signed this 20th day of January 2020

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Jason Goodman, Defendant, Pro Se
252 7th Avenue Apt 6s
New York, NY 10001
(323) 744-7594
truth@crowdsourcethetruth.org

DEFENDANT'S SWORN STATEMENT - 1